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MAY 14, 2025

**SENT VIA ECF ONLY**

HONORABLE MICHAEL A. HAMMER, U.S.M.J.  
UNITED STATES DISTRICT COURT OF NEW JERSEY  
MARTIN LUTHER KING, JR. FEDERAL BLDG. AND COURTHOUSE  
50 WALNUT STREET  
2<sup>ND</sup> FLOOR  
NEWARK, NJ 07102

**RE: JOINT LETTER OF ALL COUNSEL**  
**MYRLENE LAURINCE V. CITY OF ENGLEWOOD, et als.**  
**Civil Action No. 2:23-CV-03063 (JXN/MAH)**

Dear Judge Hammer:

Through contact with all parties' attorneys, the parties are in agreement that we cannot perform a meaningful scheduling order that will get the discovery process moving due to circumstances that are beyond all civil litigants' and their attorneys control. Counsel for the plaintiff has engaged New Jersey DAG Dronson on multiple occasions seeking answers as to what the potential time frame is for

the OAGNJ to complete their administrative investigation/cases against officers from the Englewood P.D. that were implicated in the shooting death of Bernard Placide, Jr. on 9/3/22. David pack, counsel for all of the defendants [except Officer Havlicek] emailed me that the OAGNJ remains in an investigative mode and as such the bulk of the discovery [including body cams and IA reports and IA interviews] needed to proceed forward with depositions, etc. cannot be effectuated at this time.

Given the foregoing facts, until as such time the OAGNJ has completed the administrative process so as to open the way to receive all discovery in the case we must request that the present order be extended 60 days. Defense counsel authorizes me to send this joint letter on behalf of all parties at this time.

Respectfully submitted:



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ERIC V. KLEINER, ESQ.

ATTORNEY FOR THE PLAINTIFF

DATED: 5/14/25

cc.

DAVID J. PACK, ESQ.

ROBERT F. RENAUD, ESQ.